

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :
CINDY SHERI HOLIFIELD : CASE NO. 5-18-01447
Debtor : CHAPTER 13

AMERICREDIT FINANCIAL SERVICES, :
INC., d/b/a GM FINANCIAL :

Movant, :

vs. :

CINDY SHERI HOLIFIELD :

Respondents. :

DEBTOR'S ANSWER TO MOTION FOR RELIEF FROM
AUTOMATIC STAY UNDER SECTION 362

AND NOW COMES, Cindy Sheri Holifield, and files an Answer to AmeriCredit Financial
Service's Motion for Relief From the Automatic Stay:

1. Cindy Sheri Holifield, (hereinafter the "Debtor") filed a Chapter 13 bankruptcy proceeding with the U.S. Bankruptcy Court for the Middle District of Pennsylvania.
2. Charles J. DeHart, III, Esq. was appointed the Chapter 12 Trustee.
3. Under the Chapter 13 Plan, Debtor was to make regular monthly payments to the Movant outside of the Plan.
4. Movant indicated that the Debtor is behind on the monthly payments.
5. Debtor fell behind on payments to the Movant. Debtor wishes to enter into a Stipulation to cure the remaining arrears over a six (6) month period.

6. Movant is not entitled to relief from the automatic stay as there is equity in the property encumbered by Movant's security interest, arrearage amount due has been paid or shall be paid through the Chapter 13 Plan, and, therefore, the Movant is adequately protected.

WHEREFORE, the Debtor respectfully requests that Movant's Motion for Relief from the Automatic Stay be denied.

Respectfully submitted,

Date: April 16, 2019

/s/Tullio DeLuca
Tullio DeLuca, Esquire
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on April 16, 2019, he caused a true and correct copy of Debtors' Answer to AmeriCredit Financial Service's Motion for Relief from the Automatic Stay to be served via electronic filing to the CM/ECF participant at the following:

Charles J. DeHart, III, Esq. at dehartstaff@ramapo.com

[William E. Craig, Esq. at mortonlaw.bcraig@verizon.net](mailto:mortonlaw.bcraig@verizon.net)

Date: April 16, 2019

/s/Tullio DeLuca
Tullio DeLuca, Esq.